

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JULIE ANN WILSON,

Debtor

Case Number 10-36927-DOT

CHAPTER 13

NOTICE OF MOTION TO CONVERT CASE TO CHAPTER 7

COMES NOW the Debtor, Julie Ann Wilson, by counsel, in the above entitled and numbered bankruptcy, and avers unto the Court as follows:

1. On or about October 5, 2010, Debtor filed for protection under Chapter 13 of the United States Bankruptcy Code.
2. Since that date, the Debtor has tried diligently to reorganize and arrange her affairs in a workable manner.
3. The Debtor has since fallen ill and has lost her employment and associated income.
4. Notwithstanding said diligent and reasonable efforts, Debtor's income is now insufficient to pay her creditors under a workable Chapter 13 Plan.
5. Section 1307(a) of the Bankruptcy Code provides that if the Debtor has not previously converted a case from another Chapter, and she is eligible for a Chapter 7, the

Richard W. Ferris, Esquire (VSB#31812)
FERRISWINDER PLLC
530 East Main Street
Suite 710
Richmond, Virginia 23218
804.767.1800 Phone
888.251.6228 Fax
www.ferriswinder.com

Debtor can convert this case from a Chapter 13 to a case under Chapter 7 as an absolute right. The Debtor has not previously converted this or any other case.

WHEREFORE the Debtor, by Counsel, hereby notifies all creditors and parties in interest of her intention to convert this case to one under Chapter 7.

Respectfully submitted,

BY: /s/ Richard W. Ferris
Of Counsel

Richard W. Ferris, Esquire (VSB#31812)
FERRISWINDER PLLC
530 East Main Street
Suite 710
Richmond, Virginia 23218
804.767.1800 Phone
888.251.6228 Fax
rwferris@ferriswinder.com
www.ferriswinder.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this notice has been signed by and served on all necessary parties via the ECF system this 18th day of April, 2011.

/s/ Richard W. Ferris